

ORIGINAL

INTERVENTION  
BEFORE THE ARIZONA CORPORATION COMM



COMMISSIONERS  
Kristin K. Mayes  
Gary Pierce  
Sandra D. Kennedy  
Paul Newman  
Bob Stump

RECEIVED

2009 MAY 18 P 2:34

IN THE MATTER OF THE APPLICATION OF UNIS ELECTRIC, INC.,  
FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY FOR  
THE VAIL TO VALENCIA 115 KV TO 138 KV TRANSMISSION LINE  
UPGRADE PROJECT, ORIGINATING AT THE EXISTING VAIL  
SUBSTATION IN SEC. 4, T.16S., R.15E., PIMA COUNTY, TO THE  
EXISTING VALENCIA SUBSTATION IN SEC. 5, T.24S., R.14E., IN  
THE CITY OF NOGALES, SANTA CRUZ COUNTY, ARIZONA.

Docket No. L-00000F-09-0144-0190-00144

Arizona Transmission and Power Plant Line  
Siting  
Case No. 144

**Notice of Filing a Motion to Intervene**

by

Elizabeth Buchroeder-Webb (Elizabeth Webb)

As a ratepayer, consumer, and interested party, I respectfully request to be a party in this matter. I have experiences involving Vail and Pima County energy issues as a civilian intervener in TEP Line Site Case 138 and City of Tucson Case SE-08-05 TEP Cienega Substation Dawn Drive RH Zone (Ward 4). Additionally, I am a community volunteer in local historic, cultural, educational, environmental issues as well as a member of the Vail Preservation Society and the Hilton Ranch Community Association. Potential issues should be prudently resolved during this case. The key issue is the impact to the natural, historic and human environment within the approximately 425 square miles of the Vail School District boundaries- an area also encompassed within the identified boundaries of the Vail Preservation Society. I respectfully ask **not to be combined** with any other interveners in this case as my area of interest is predominately within Segment 1A and a smidge south of there within Pima County.-.

The following are concerns in this case:

1. Environmental impacts of new transmission line routes and associated access roads.
2. Visual impacts of "weathered" compared to less visible galvanized steel poles
3. Repetitive impacts to the natural, cultural and human environments of one county/area in Arizona for the benefit of a different county/area and another separate corporation in the state of Arizona-particularly in rural areas.

If this motion is approved, I request a discovery period through 30 June 2009, due to the short time between date of my motion to intervene and the hearings. If the applicant denies any discovery data request, that response requires rapid adjudication. Such denied response needs to include the Committee Chairman as an addressee so any dispute can be promptly resolved. I plan to dispute any data request denial to the Committee Chairman within 3 days. Ten calendar days for data request responses is expected and appreciated.

Arizona Corporation Commission

DOCKETED

MAY 18 2009

DOCKETED BY

This filing has been mailed to all parties in the Service List below.

Respectfully submitted on this 13<sup>th</sup> day of May 2009

ELIZABETH BUCHROEDER

By

  
Elizabeth Buchroeder-Webb  
17451 E. Hilton Ranch Rd.  
Vail, Arizona 85641  
(520) 247-3838  
vailaz@hotmail.com

Service List

Original and 25 copies of the foregoing are filed this date with:

Docket Control (25 copies)  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007-2927

**Janice Alward**, Chief Counsel, Legal Division  
**Earnest G. Johnson**, Director, Utilities Division  
**John Foreman**, Chairman of the Arizona Power Plant and Transmission Line Siting Committee  
Assistant Attorney General, State of Arizona, Office of the Attorney General  
1275 West Washington Street  
Phoenix, Arizona 85007

Jason D. Gellman, Attorney for the Applicant  
Roshka De Wulf and Patten  
One Arizona Center  
400 East Van Buren St. Suite 800  
Phoenix, AZ 85004-2262

Marcus Jerden, Corporate Attorney  
Tucson Electric Power Company  
PO Box 711  
Tucson, AZ 85711

Daniel Pozefsky, Chief Counsel  
Residential Utility Consumer Office (RUCO)  
1110 W. Washington St. Ste. 220  
Phoenix AZ 85007-2958

Marshall Magruder, Intervener  
PO Box 1267  
Tubac, Arizona 85646-1267